

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE**

IPA TECHNOLOGIES, INC.,

Plaintiff,

v.

AMAZON.COM, INC. and AMAZON DIGITAL
SERVICES LLC,

Defendants.

The Honorable Richard G. Andrews

Civil Action No. 1:16-CV-01266-RGA

**NOTICE OF GROUNDS OF INVALIDITY OF ASSERTED CLAIMS OF
DEFENDANTS AMAZON.COM, INC. AND AMAZON DIGITAL SERVICES LLC**

Pursuant to the Court's order during the discovery conference held on July 24, 2020, Defendants Amazon.com, Inc. and Amazon Digital Services, LLC¹ (collectively, "Amazon") hereby provide notice of its four grounds of invalidity for each asserted claim identified in Plaintiff IPA Technologies Inc.'s Notice of Reduction of Asserted Claims. Dkt. No. 151.

Fact discovery is ongoing and Amazon has not yet completed its investigation, discovery, or analysis of matters relating to the invalidity or unenforceability of the asserted claims including, without limitation, invalidity based on prior art, on-sale statutory bars, public use statutory bars, improper inventorship, or unenforceability due to inequitable conduct. Amazon expects further discovery will reveal additional prior art, including related disclosures and corresponding evidence for many of the prior art references identified herein. Amazon's disclosures herein are not and should not be interpreted as a statement that no other persons have discoverable information, that no other documents, data compilations, and/or tangible things

¹ On January 1, 2020, Amazon Digital Services, LLC merged into Amazon.com Services LLC.

exist that Amazon may use to support its claims or defenses, or that no other legal theories or factual bases will be pursued. Accordingly, Amazon reserves the right to amend, modify and/or supplement this identification of grounds of invalidity of the asserted claims as additional information is discovered, identified, or otherwise appreciated, including testimony about the scope and content of the prior art and the claimed inventions.

U.S. Patent No. 6,851, 115 (“’115 patent”)

Patent, Claim(s)	Grounds of Invalidity (Basis)
’115 patent, claims 1, 5-7, 10, 11, 71	1. OAA system ² (§ 103) 2. RETSINA System ³ , Kiss ⁴ , and MECCA ⁵ (§ 103) 3. KQML/KIF ⁶ , Kiss, and MECCA (§ 103) 4. FIPA 97 ⁷ , Kiss, and MECCA (§ 103)
’115 patent, claim 15	1. OAA system and Malone ⁸ (§ 103)

² “OAA system” includes prior art versions of source code, publications, and demonstrations that describe and relate to OAA, including, for example, the prior art identified in Exs. A-1, B-1, C-1, A-2, B-2, C-2 A-3, B-3, C-3, A-6, B-6, C-6 A-11, B-11, C-11, A-17, B-17, C-17, A-18, B-18, C-18, and A-19, B-19, C-19 of Defendants’ Preliminary Invalidity Contentions and Defendants’ First Supplemental Invalidity Contentions.

³ “RETSINA system” includes prior art versions of source code, publications, and demonstrations that describe and relate to RETSINA, including, for example, the prior art identified in Exs. A-22, B-22, C-22 and A-26, B-26, C-26 of Defendants’ Preliminary Invalidity Contentions and Defendants’ Second Supplemental Invalidity Contentions.

⁴ “Kiss” refers to the prior art identified in Exs. A-15, B-15, C-15 of Defendants’ Preliminary Invalidity Contentions.

⁵ “MECCA” refers to the prior art identified in Exs. A-9, B-9, C-9 of Defendants’ Preliminary Invalidity Contentions.

⁶ “KQML/KIF” includes prior art versions of source code implementing KQML/KIF, publications describing KQML/KIF, and demonstration of KQML/KIF, including, for example, the prior art identified in Exs. A-7, B-7, C-7, A-8, B-8, C-8, A-10, B-10, C-10, A-14, B-14, C-14, A-20, B-20, C-20, A-23, B-23, C-23, and A-25, B-25, C-25 of Defendants’ Preliminary Invalidity Contentions, Defendants’ First Supplemental Invalidity Contentions, and Defendants’ Second Supplemental Invalidity Contentions.

⁷ “FIPA 97” refers to the seven-part FIPA 1997 specification as identified in Ex. A-16, B-16, C-16 of Defendants’ Preliminary Invalidity Contentions.

⁸ “Malone” refers to the prior art identified in Exs. A-X and C-X of Defendants’ Preliminary Invalidity Contentions.

Patent, Claim(s)	Grounds of Invalidity (Basis)
	2. RETSINA System, Kiss, MECCA, and Malone (§ 103) 3. KQML/KIF, Kiss, MECCA, and Malone (§ 103) 4. FIPA 97, Kiss, MECCA, and Malone (§ 103)
'115 patent, claim 29, 34, 35, 61	1. OAA system and Kohn ⁹ (§ 103) 2. RETSINA System, Kiss, MECCA, and Kohn (§ 103) 3. KQML/KIF, Kiss, MECCA, and Kohn (§ 103) 4. FIPA 97, Kiss, MECCA, and Kohn (§ 103)
'115 patent, claim 38, 64, 69	1. OAA system, Kohn, and Malone (§ 103) 2. RETSINA System, Kiss, MECCA, Kohn, and Malone (§ 103) 3. KQML/KIF, Kiss, MECCA, Kohn, and Malone (§ 103) 4. FIPA 97, Kiss, MECCA, Kohn, and Malone (§ 103)
'115 patent, claim 62	1. OAA system, Kohn, and Pollock ¹⁰ (§ 103) 2. RETSINA System, Kiss, MECCA, Kohn, and Pollock (§ 103) 3. KQML/KIF, Kiss, MECCA, Kohn, and Pollock (§ 103) 4. FIPA 97, Kiss, MECCA, Kohn, and Pollock (§ 103)

U.S. Patent No. 7,069,560 (“’560 patent”)

Patent, Claim(s)	Grounds of Invalidity
'560 patent, claim 1, 20, 22, 26, 45, 50	1. OAA system and Bian ¹¹ (§ 103) 2. RETSINA System, Kiss, MECCA, and Bian (§ 103) 3. KQML/KIF, Kiss, MECCA, and Bian (§ 103) 4. FIPA 97, Kiss, MECCA, and Bian (§ 103)
'560 patent, claim 28, 29, 34	1. OAA system, Bian, and Malone (§ 103)

⁹ “Kohn” refers to the prior art identified in Ex. A-X of Defendants’ Preliminary Invalidity Contentions.

¹⁰ “Pollock” refers to the prior art identified in Ex. A-X of Defendants’ Preliminary Invalidity Contentions.

¹¹ “Bian” refers to the prior art identified in Ex. C-X of Defendants’ Preliminary Invalidity Contentions.

Patent, Claim(s)	Grounds of Invalidity
	2. RETSINA System, Kiss, MECCA, Bian, and Malone (§ 103) 3. KQML/KIF, Kiss, MECCA, Bian, and Malone (§ 103) 4. FIPA 97, Kiss, MECCA, Bian, and Malone (§ 103)

U.S. Patent No. 7,036,128 (“’128 patent”)

Patent, Claim(s)	Grounds of Invalidity
’128 patent, claims 23, 40	1. OAA system ¹² , General Magic system ¹³ , and Steiner ¹⁴ (§ 103) 2. RETSINA System, Kiss, MECCA, General Magic system, and Steiner (§ 103) 3. KQML/KIF, Kiss, MECCA, General Magic system, and Steiner (§ 103) 4. FIPA 97, FIPA 98 ¹⁵ , Kiss, MECCA, General Magic system, and Steiner (§ 103)
’128 patent, claim 24	1. OAA system, SFMAP, MVIEW, Multimodal Maps (web capture and demo), Julia, General Magic system, Steiner, and Tamai ¹⁶ (§ 103) 2. RETSINA System, Kiss, MECCA, General Magic system, Steiner, and Tamai (§ 103) 3. KQML/KIF, Kiss, MECCA, General Magic system, Steiner, and Tamai (§ 103) 4. FIPA 97, FIPA 98, Kiss, MECCA, General Magic system, Steiner, and Tamai (§ 103)

¹² For the ’128 patent, “OAA system” further includes “SFMAP,” “MVIEW,” “Multimodal Maps (web capture),” “Multimodal Maps Demo,” and “Julia,” prior art identified in Ex. B-X of Defendants’ Preliminary Invalidity Contentions.

¹³ “General Magic system” includes the publications that describe and relate to the General Magic Magic Cap operating system implemented on PDAs, including, for example, the prior art identified in Exs. A-22, B-22, C-22 of Defendants’ Preliminary Invalidity Contentions.

¹⁴ “Steiner” refers to the prior art identified in Ex. B-X of Defendants’ Preliminary Invalidity Contentions.

¹⁵ “FIPA 98” refers to the twelve-part FIPA 1998 specification as identified in Ex. B-X of Defendants’ Preliminary Invalidity Contentions.

¹⁶ “Tamai” refers to the prior art identified in Ex. B-X of Defendants’ Preliminary Invalidity Contentions.

Patent, Claim(s)	Grounds of Invalidity
'128 patent, claim 25	<ol style="list-style-type: none"> 1. OAA system, General Magic system, Steiner, Trovato¹⁷, and Sharman¹⁸ (§ 103) 2. RETSINA System, Kiss, MECCA, General Magic system, Steiner, Trovato, and Sharman (§ 103) 3. KQML/KIF, Kiss, MECCA, General Magic system, Steiner, Trovato, and Sharman (§ 103) 4. FIPA 97, FIPA 98, Kiss, MECCA, General Magic system, Steiner, Trovato, and Sharman (§ 103)
'128 patent, claim 26	<ol style="list-style-type: none"> 1. OAA system, General Magic system, Steiner, Trovato, Sharman, and Malone (§ 103) 2. RETSINA System, Kiss, MECCA, General Magic system, Steiner, Trovato, Sharman, and Malone (§ 103) 3. KQML/KIF, Kiss, MECCA, General Magic system, Steiner, Trovato, Sharman, and Malone (§ 103) 4. FIPA 97, FIPA 98, Kiss, MECCA, General Magic system, Steiner, Trovato, Sharman, and Malone (§ 103)

¹⁷ “Trovato” refers to the prior art identified in Ex. B-X of Defendants’ Preliminary Invalidity Contentions.

¹⁸ “Sharman” refers to the prior art identified in Ex. B-X of Defendants’ Preliminary Invalidity Contentions.

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